

September 1, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **Subscriber Acknowledgement Report (September 1, 2005)**  
**Broadline Communications, Inc.; WC Docket No. 05-196**

Dear Ms. Dortch:

Broadline Communications, Inc. ("Broadline"), through undersigned counsel and in response to the Commission's VoIP E911 Order ("Order") and the Public Notice issued by the Enforcement Bureau ("Bureau") on August 26, 2005 ("Public Notice"), submits this Subscriber Acknowledgement Report ("Report") to advise the Commission of the status of Broadline's efforts to comply with Commission Rule 9.5(e). Broadline previously filed a Subscriber Acknowledgement Report on August 10, 2005 in response to the Bureau's July 26, 2005 Public Notice ("August 10 Report").

As requested in the Public Notice, Broadline responds to the following questions set out in the Public Notice:

- 1) **A detailed explanation regarding current compliance with the notice and warning sticker requirements *if* the provider did not notify and issue warning stickers or labels to 100% of its subscribers by the July 29, 2005 deadline. Providers expected to update this information include those that were in the process of providing notice and/or stickers to their subscribers, but had not completed the process by July 29, 2005.**

Broadline sent customer notification and warning labels to every existing VoIP subscriber by July 29, 2005. Further, as of August 19, 2005, Broadline sent E911 customer notifications and warning labels to all new VoIP subscribers that signed up for service after the initial notice was mailed. The notice sent to Broadline customers requested that the VoIP subscriber

September 1, 2005

Page 2

provide an affirmative acknowledgement by either returning an executed acknowledgement form included in the mailing or completing an acknowledgement form on the Internet.

- 2) A quantification of the percentage of the provider's subscribers that have submitted affirmative acknowledgements as of the date of the September 1 and September 22 reports, and an estimation of the percentage of subscribers from whom the provider does not expect to receive an acknowledgement by September 28, 2005.**

As of August 30, 2005, Broadline has obtained affirmative acknowledgement from approximately 70.9% of its VoIP subscriber base. Broadline cannot predict with certainty what its final response rate will be, but estimates that 10% of customers will still not have provided affirmative acknowledgement by September 28, 2005.

- 3) A detailed description of any and all actions the provider plans to take towards any of its subscribers that do not affirmatively acknowledge having received and understood the advisory.**

As detailed in Broadline's August 10 Report, Broadline is continuing its campaign to contact and obtain affirmative acknowledgment from all VoIP subscribers. Between August 30, 2005 and September 28, 2005 Broadline will send out reminder notices and e-mail notices and place follow up calls to VoIP subscribers from whom the Company has not received affirmative acknowledgement. As part of their advisories, Broadline is notifying its VoIP subscribers that service may be restricted if Broadline does not receive affirmative acknowledgement prior to September 28, 2005.

- 4) A detailed description of any and all plans to use a "soft" or "warm" disconnect (or similar) procedure for subscribers that fail to provide an affirmative acknowledgement by September 28, 2005.**

The Company's goal is to receive acknowledgement from 100% of its VoIP subscribers prior to September 28, 2005. Given that the Public Notice was released less than one week ago, the Company is still exploring whether and how a "soft" disconnection could be implemented should the FCC clarify that "soft" disconnection is required for non-responsive customers. At this time, the Company anticipates that under a soft disconnection, non-911 outbound calls could receive a recording that directs the customer to customer service and 911 calls could be routed to 911 just as if the customer's account was in active status.

September 1, 2005

Page 3

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jean L. Kiddoo".

Jean L. Kiddoo

Russell M. Blau

Wendy M. Creeden

Counsel for Broadline Communications, Inc.

cc: Byron McCoy (FCC)  
Kathy Berthot (FCC)  
Janice Myles (FCC)  
Best Copy and Printing, Inc.  
Matthew Fiel (Broadline)  
Timothy Tuck (Broadline)

I, Timothy Tuck, state that I am authorized to submit the forgoing ~~Subscriber Acknowledgement~~ *Report* ("Report") on behalf of Broadline Communications, Inc.; that the *Report* was prepared under my direction and supervision; and I declare under penalty of perjury that the *Report* is true and correct to the best of my knowledge, information, and belief.



---

Name: Timothy Tuck  
Broadline Communications, Inc.